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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MIRIAM GOLDBERG,
a/k/a Marina Sokolovskaya,

Plaintiff,

v.

TEACHBK, INC., ILYA KISELEV and
ANDREI BURTSEV,

Defendants.

Case No.: 3:24-cv-04525

**VERIFIED NOTICE OF
DEFENDANT ILYA KISELEV'S
NONCOMPLIANCE WITH COURT
ORDER REGARDING DISCOVERY**

1 On September 5, 2025, the Court entered an Order Regarding Discovery Dispute
2 (the “Order”) [ECF No. 63], in which it ordered (1) Defendants Ilya Kiselev and Andrei
3 Burtsev to “produce the full email exchange between Mr. Burtsev and FBI Agent Jason
4 Fuller as well as all other communications between Defendants and the FBI regarding
5 Plaintiff”; and (2) Defendant Kiselev to “serve amended responses substantively
6 responding to RFAs Nos. 1 through 7.” [*Id.* at 2, 3]. Defendants were required to
7 comply with the Order no later than September 19, 2025.

8 On the same date as its issuance, the undersigned forwarded a copy of the Order
9 to Defendants Kiselev and Burtsev via email, copying former counsel Alla Vorobets, per
10 the Court’s Order of Withdrawal [ECF No. 54 at 3], and informed Defendants that they
11 were required to provide the above-referenced records and supplemental responses no
12 later than September 19. The undersigned filed a certificate of service reflecting the
13 same. [ECF No. 64].

14 Several hours after emailing a copy of the Order to Defendants Burtsev and
15 Kiselev, Mr. Burtsev replied to the undersigned’s email, wherein he enclosed three .eml
16 files containing what he has confirmed in writing to be the complete substance of the
17 email conversation with Special Agent Fuller. The following day the undersigned
18 emailed Defendants to confirm whether these three files were the extent of their
19 communications with the FBI. The next day, Mr. Burtsev responded that they were all
20 the communications *he* possessed. The undersigned responded and inquired whether
21 the same was true for Mr. Kiselev. Mr. Kiselev did not respond.

22 On September 15, the undersigned wrote to Defendants again via email and
23 asked Mr. Kiselev (1) to confirm whether he had any additional records or
24 communications with the FBI and (2) to remind him that his supplemental responses
25 to RFAs Nos. 1-7 were not yet received. The undersigned informed Mr. Kiselev that if
26 he did not provide the records by September 19, the undersigned would need to inform
27 the Court. Mr. Kiselev again did not respond.

28 To date, Mr. Kiselev has not complied with the Order.

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the
2 foregoing is true and correct.

3 Executed on September 20, 2025.

4 Respectfully submitted,

5 /s/ James M. Slater

6 James M. Slater (admitted *pro hac vice*)

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